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Attorneys for Plaintiff NML Capital, Ltd.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NML CAPITAL, LTD.,

CASE NO. CV 14-02262-SVW (Ex)

Plaintiff,

[Assigned to the Honorable Stephen V.
Wilson]

SPACE EXPLORATION
TECHNOLOGIES CORP., aka
SPACEX, a Delaware corporation; THE
REPUBLIC OF ARGENTINA, a
foreign state, including its *COMISIÓN
NACIONAL DE ACTIVIDADES
ESPAZIALES*, aka CONAE, a political
subdivision of the Argentine State; and
DOES 1-10.

**STIPULATION REGARDING THE
BRIEFING SCHEDULE ON
DEFENDANTS' MOTIONS TO
DISMISS THE COMPLAINT**

Defendants.

1 WHEREAS, on April 9, 2014, Plaintiff NML Capital, Ltd. (“NML”) and
2 Defendant Space Exploration Technologies Corporation (“SpaceX”) entered into a
3 stipulation pursuant to L.R. 8-3 setting May 15, 2014 as the deadline for SpaceX to
4 answer or otherwise respond to NML’s Complaint in this action;

5 WHEREAS, on May 8, 2014, the attorneys representing NML, SpaceX, and
6 Defendant Republic of Argentina (“Argentina”) participated in a conference of
7 counsel pursuant to L.R. 7-3, in which the parties discussed the substance of
8 Defendants’ contemplated motions to dismiss;

9 WHEREAS, on May 12, 2014, the attorneys representing NML, SpaceX, and
10 Argentina participated in a follow-up conference of counsel regarding the substance
11 of Defendants’ contemplated motions to dismiss, and agreed upon a briefing
12 schedule that they believe is necessary to fully and fairly address the issues to be
13 raised in Defendants’ motions to dismiss;

14 WHEREAS, Defendants Argentina and SpaceX filed their motions to dismiss
15 on May 15, 2014; and

16 THEREFORE, the parties, through their undersigned counsel, hereby
17 stipulate and agree, subject to the Court’s approval, to the following briefing and
18 hearing schedule on Defendants’ motions to dismiss:

19 1. Plaintiff NML’s opposition brief to Defendants’ motions to dismiss
20 shall be filed on or before June 5, 2014;

21 2. Defendants’ reply briefs in support of their motions to dismiss shall be
22 filed on or before June 16, 2014; and

23 3. The hearing on Defendants’ motions to dismiss shall be scheduled for
24 June 30, 2014, or some later date convenient to the Court. Counsel for SpaceX and
25 Argentina have scheduling conflicts that would prevent them from attending any
26 hearing scheduled on July 7 or 14. Consequently, the next available hearing date
27 after June 30 when counsel for all parties could attend is July 21, 2014.

1 DATED: May 16, 2014

COOLEY LLP
William P. Donovan, Jr.

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By /s/ William P. Donovan, Jr.
William P. Donovan, Jr.
Attorneys for Defendant
Space Exploration Technologies Corp.

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DATED: May 16, 2014

MANATT, PHELPS & PHILLIPS, LLP
Donald R. Brown

By /s/ Donald R. Brown

Donald R. Brown
Attorneys for Defendant
Republic of Argentina

DATED: May 16, 2014

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SULLIVAN, LLP

Harold A. Barza
Bruce E. Van Dalsem
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Matthew S. Hosen

By /s/ Harold A. Barza

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Attorneys for Plaintiff
NML Capital, Ltd.